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10 Attorneys for Defendant  
11 Larson & Zirzow, LLC

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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

FRESH MIX, LLC,

Plaintiff

vs.

PISANELLI BICE, PLLC, a Nevada Law Firm and Professional Limited Liability Company, JAMES P. PISANELLI, ESQUIRE, an individual, DEBRA L. SPINELLI, ESQUIRE, an individual, AVA SCHAEFER, ESQUIRE, an individual, COHEN DOWD QUIGLEY PC, an Arizona Law Firm and Professional Corporation, RONALD J. COHEN, an individual, BETSY LAMM, an individual, DANIEL QUIGLEY, an individual, JENNA BROWNLEE, an individual, BRUCE A. LESLIE, CHTD, A Nevada Firm, BRUCE A. LESLIE, an individual; BROWNSTEIN HYATT FARBER SCHRECK LLP; a Colorado Limited Liability Partnership; SAMUEL A. SCHWARTZ, an individual, and SCHWARTZ LAW, PLLC, and ZACHARIAH LARSON, an individual, and LARSON & ZIRZOW, LLC

Defendant(s).

Case No. 2:24-cv-00397-JCM-NJK

STIPULATION TO EXTEND TIME TO  
RESPOND TO PLAINTIFF'S FIRST  
AMENDED COMPLAINT  
(FIRST REQUEST)

Defendant Larson & Zirzow, LLC and Plaintiff Fresh Mix, LLC, by and through their undersigned attorneys of record, hereby agree and request that the Court extend the deadline for Defendant Larson & Zirzow, LLC to respond to Plaintiff's First Amended Complaint from April 10, 2024 to April 30, 2024.

1        This stipulation is submitted in compliance with LR IA 6-1. Good cause exists for the  
2 requested extension based upon the following:

3        Plaintiff Fresh Mix, LLC named both Larson & Zirzow and Zachariah Larson as defendants  
4 in the captioned matter. Larson & Zirzow was served on March 20, 2024, yielding a response date  
5 of April 10, 2024. Mr. Larson has not yet been served. Mr. Larson has arranged to be served on  
6 April 9, 2024, which will be deemed the effective date of service. Mr. Larson and the firm would  
7 like to file their response on the same date, thus would like to select Mr. Larson's response date  
8 (April 30, 2024) as the date both responses will be due.

9        Further, the bankruptcy proceeding that underlies Plaintiff's claims against Mr. Larson and  
10 Larson & Zirzow is voluminous, with over 500 docket entries. Counsel for Mr. Larson and the firm  
11 was not involved in either the bankruptcy described in the complaint, or any of the other proceedings  
12 mentioned (a state court arbitration), thus needs some additional time to review these filings in order  
13 to evaluate an appropriate response. The extra time requested by this stipulation only applies to  
14 Larson & Zirzow.

15       The parties agree that the requested extension furthers the interest of this litigation and is not  
16 being requested in bad faith or to delay these proceedings unnecessarily, and request that the Court  
17 approve the stipulation.

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1 This is the parties' first request for extension of this deadline.

2 SO STIPULATED:

3 DATED this 8th day of April, 2024.

WILSON, ELSER, MOSKOWITZ, EDELMAN  
& DICKER LLP

4 By: /s/ Sheri M. Thome  
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12 *Larson & Zirzow, LLC*

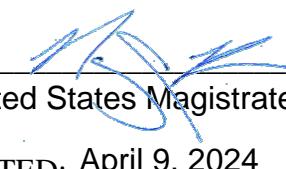
13 DATED this 8th day of April, 2024.

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28 Counsel for Plaintiff, Fresh Mix LLC

**ORDER**

20 **IT IS SO ORDERED.**

21   
22 United States Magistrate Judge

23 DATED: April 9, 2024